

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Ameren Transmission Company of Illinois	}	
	}	
Petition for a Certificate of Public Convenience	}	
and Necessity, pursuant to Section 8-406.1 of	}	
the Illinois Public Utilities Act, and an Order	}	
pursuant to Section 8-503 of the Public Utilities	}	Case No.: 12-0598
Act, to Construct, Operate and Maintain a New	}	
High Voltage Electric Service Line and Related	}	
Facilities in the Counties of Adams, Brown, Cass,	}	
Champaign, Christian, Clark, Coles, Edgar,	}	
Fulton, Macon, Montgomery, Morgan, Moultrie,	}	
Pike, Sangamon, Schuyler, Scott, and Shelby,	}	
Illinois.	}	

RESPONSE TO MOTION FOR LEAVE TO FILE AMENDED LANDOWNER LIST

NOW COME Colfax-Scott Land Preservation Group and Morgan, Sangamon, and Scott Counties Land Preservation Group (hereinafter collectively referred to as “Undersigned”), by their attorneys, Edward D. McNamara, Jr. and Joseph H. O’Brien of McNamara & Evans, and for their Response to the Motion for Leave to File Amended Landowner List and for Order Directing the Clerk to Issue Notice to Certain Affected Landowners (hereinafter referred to as “Motion”) filed herein by Ameren Transmission Company of Illinois (hereinafter referred to as “ATXI”) state as follows:

1. ATXI filed its Petition herein on November 7, 2012, seeking a certain Certificate of Public Convenience and Necessity on an expedited basis.
2. This is a massive case involving the property rights of hundreds, if not thousands, of private landowners located in East-Central, Central, and West-Central Illinois. Certain landowners have petitioned to intervene pro se. Other landowners have petitioned to intervene pursuant to petitions filed by attorneys. A review of the active service list in this matter will indicate

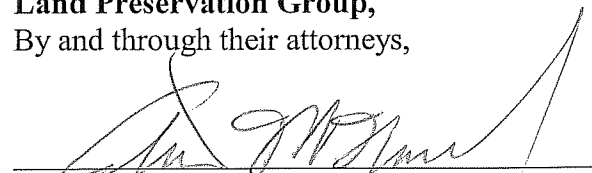
that in excess of three dozen attorneys have filed appearances herein.

3. Certain of the Intervenor herein have proposed further alternate routes and have furnished the Clerk of the Illinois Commerce Commission the names of additional private landowners of property along and upon the proposed further alternate routes to be notified.
4. On December 12, 2012, the Chief Clerk served a Notice of Administrative Law Judge's Ruling, which in relevant part directed ATXI to respond to the following questions, to wit:
"In order to reduce the number of issues to be resolved under the shortened statutory deadline, would ATXI be willing to withdraw the Sidney to Rising portion of its Illinois Rivers Project? If not, please explain why." [. . .] "In order to reduce the number of issues to be resolved under the shortened statutory deadline, would ATXI be willing to withdraw the Ipava to Meredosia portion of its Illinois Rivers Project? If not, please explain why."
5. On December 19, 2012, ATXI responded to the above questions and answered "No."
6. The Motion has the potential of adding in excess of 100 new parties to this case.
7. The Motion provides in part as follows: "ATXI would not object to a modified schedule for any new intervenors—the landowners listed in Appendix A—that wish to participate in this proceeding as a result of receiving direct notice from the Clerk, provided the proceeding still concludes in the statutorily mandated 225 days for all parties."
8. The Undersigned would simply submit that this is a case that should not be decided on an expedited basis. More than two months after the inception of this case, ATXI is seeking to amend its original Petition, but continues to demand a decision by this Commission on an expedited basis.
9. This is not a case that should be decided on an expedited basis. Any private landowner whose property rights will be affected by any decision herein deserves better.

10. The Undersigned would further respectfully submit that allowing a case of this magnitude to proceed on an expedited basis would be incongruous with the esteem in which decisions of this Commission are held, the very important work conducted by this Commission, and the Rule of Law in general. Private landowners will be affected and should have ample opportunity to have their say. This proceeding, for such landowners, is the one and only opportunity to voice their opinions. This opportunity should not be diminished simply because ATXI has, for tactical or other reasons, sought an expedited order herein.
11. The Undersigned would request that the Administrative Law Judges assigned herein direct all parties represented by attorney, and all pro se intervenors, to be prepared and authorized to discuss, negotiate, and settle the issues as to time limits herein, including but not limited to ATXI and/or its attorneys being prepared to present the official position of ATXI as to modifying its Petition herein to eliminate the request for an expedited order.

WHEREFORE, the undersigned respectfully request that any decision as to the Motion be held in abeyance until on or after the Status Conference now scheduled for Thursday, January 17, 2013.

**Respectfully Requested,
Colfax-Scott Land Preservation Group and
Morgan, Sangamon, and Scott Counties
Land Preservation Group,
By and through their attorneys,**



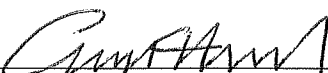
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VERIFICATION


STATE OF ILLINOIS }
 }SS
COUNTY OF SANGAMON }

Edward D. McNamara, Jr., being first duly sworn, deposes and says that he is authorized to execute this Response to Motion for Leave to File Amended Landowner List; that he has read the above and foregoing document, has knowledge of the facts stated therein; and herewith states that the matters set forth therein are true and in substance and in fact.

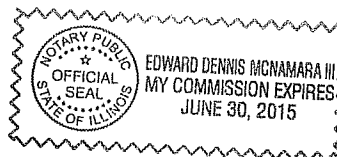


Edward D. McNamara, Jr.

Subscribed and Sworn to before me
this 9th day of January, 2013.

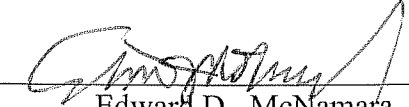


Notary Public



CERTIFICATE OF SERVICE

Edward D. McNamara, Jr., an attorney, hereby certifies that he served copies of the foregoing Response to Motion for Leave to File Amended Landowner List on the individuals shown on the below Service List, via electronic mail, on January 9, 2013.


Edward D. McNamara, Jr.

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